

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Industrial Laminates/Norplex
ADDRESS: 665 Hybrand Street
EPA ID NUMBER: IAD073484288 DATE: May 8, 2003

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. 40 CFR 265.53(b) - Revised contingency plan hasn't been submitted to emergency response agencies.
2. 40 CFR 265.52(a) - Contingency plan doesn't list addresses for emergency coordinators. Contingency plan only includes phone number for one emergency coordinator.
3. 40 CFR 265.52(e) - Contingency plan doesn't include a list and description of emergency equipment.
4. 40 CFR 265.16(d)(4) - Facility could not produce documentation of RCRA training given to employees in 2001 & 2002.
5. 40 CFR 265.16(d)(1) - Facility could not produce documentation showing job title and name of employee filled that position for primary emergency coordinators.
6. 40 CFR 265.16(d)(3) - Facility does not have a written description of interagency and contingency planning for emergency coordinators.
7. 40 CFR 273.13(d)(1) - Containers for storage of bulk lamps were not closed.

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Scott, Loren TITLE: HSE Mgr
SIGNATURE: Scott Loren

This document was prepared by Dean J. Williams, Tetra Tech EMJ

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R00416862

RCRA RECORDS CENTER

NOTICE OF PRELIMINARY FINDINGS (Continued)

FACILITY NAME: Industrial Luminaires/Norplex

ADDRESS: 665 Lybound Street

6/30/05 Postville, IA 52162 - 0977

EPA ID NUMBER: IAD073489288 **DATE:** May 8, 2003

8. 40 CFR 273.14(e) - Containers used for storage of waste lamps were not marked "scellamps", "wastelamps", or "universal wastelamps."

INITIALS OF RECIPIENT: RH

INITIALS OF PREPARER: DIW